

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000



December 3, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

941102 - EI

Dear Ms. Bayo:

RE: Request for Confidential Classification
Quarterly Real Time Pricing Program Report for the Third Quarter 1997

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification for the Quarterly Real Time Pricing Program Report for the Third Quarter 1997.

Sincerely,

A handwritten signature in cursive script that reads "Linda G. Malone".

Linda G. Malone
Assistant Secretary and Assistant Treasurer

lw

cc: Beggs and Lane
Russell A. Badders
Florida Public Service Commission
Connie Kummer
Gulf Power Company
Susan D. Cranmer

X-ref 11801-97
DOCUMENT NUMBER-DATE

12483 DEC-55

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Real
Time Pricing Program report
for the Third Quarter 1997

Docket No.:
Date: December 4, 1997

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information, hereafter the Quarterly RTP Report, submitted to the Florida Public Service Commission pursuant to Order No. PSC-95-0256-FOF-EI. As grounds for this request, the Company states:

1. On or about November 17, 1997, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company's Quarterly Real Time Pricing ("RTP") Program report for the Third Quarter 1997 as required by Order No. PSC-95-0256-FOF-EI. Gulf Power asserts that the information contained in the Quarterly RTP Report is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of Gulf Power and those customers taking service under Gulf Power Company's RTP rate schedule. The Quarterly RTP Report contains proprietary and commercially sensitive information that is not otherwise publicly available.

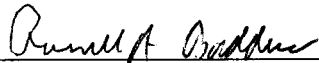
2. The Public disclosure of the information contained in the Quarterly RTP Report would cause irreparable harm to Gulf Power Company and those customers taking service under Gulf Power Company's RTP rate schedule. The Quarterly RTP Report contains proprietary confidential business information that details customer specific information that is regarded as sensitive and confidential by the customers taking service under rate schedule RTP. The public disclosure of this detailed customer information would impact the customers' ability to compete in their native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.

3. Submitted as Exhibit "A" is a copy of the Quarterly RTP Report, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the Quarterly RTP Report, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the customers taking service pursuant to rate schedule RTP and has not been otherwise publicly disclosed.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 4 th day of December 1997,



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 007455
Beggs & Lane
P. O. Box 12950
(700 Blount Building)
Pensacola, FL 32576-2950
(850) 432-2451
Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Real
Time Pricing Program report
for the Third Quarter 1997

Docket No.:
Date: December 4, 1997

EXHIBIT "A"

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

EXHIBIT "A"

Provided to the Division of Records and Reporting
under separate cover as confidential information

EXHIBIT "B"

GULF POWER COMPANY
EXPERIMENTAL RATE RTP QUARTERLY REPORT

Program Cost

Eleventh Quarterly Report

Report Period: Third Quarter 1997

	<u>3rd Quarter 1997</u>	<u>Year-To-Date</u>	<u>Project to Date</u>
Revenue (Shortfall)/Gain	(\$252,516.85)	(\$4,550,010.96)	(\$10,450,447.15)
Other RTP Program Costs	\$18,294.35	\$24,495.61	\$72,856.49

Impact of Total Costs on Earnings in Terms of Basis Points: 116

**Notes to Quarterly Real Time Pricing
Program Cost Report**

This quarterly report is intended to comply with the reporting requirements found on page 3 of Order No. PSC-95-0256-FOF-EI in docket number 941102-EI. As such, the report addresses only costs associated with Gulf Power's Real Time Pricing (RTP) program.

The revenue (shortfall)/gain reported does not represent the differences in base rate revenues which may be attributed to this program. The amount reported is merely the result of calculating, for each month of the quarter, the difference between the base rate revenue in cents per KWH using the previous rate and the RTP base rate revenue in cents per KWH; then summing these monthly amounts to arrive at the reported amount.

GULF POWER COMPANY
 EXPERIMENTAL RATE RTP QUARTERLY REPORT
 BASE RATE REVENUE (SHORTFALL) GAIN

1997	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
	NGKW	RG KW	RC KW	Sum of Daily KW's	CMM/ NON-CMM	Max KW	Non-SE On-Peak KW	Max KVAR	Excess KVAR	SBS KWH	On-Peak KWH	Adjusted SBS Base Bll	Adjusted SBS (KWH)	Adjusted RTP (KWH)	Difference in (KWH)	RTP KWH	(Shortfall) Gain
1 July	10,000	18,329	18,329														
2 August	10,000	18,329	18,329														
3 September	10,000	18,329	18,329														
																	SUBTOTAL

1997	NGKW	RG KW	RC KW	Sum of Daily KW's	CMM/ NON-CMM	Max KW	Non-SE On-Peak KW	Max KVAR	Excess KVAR	SBS KWH	On-Peak KWH	Adjusted SBS Base Bll	Adjusted SBS (KWH)	Adjusted RTP (KWH)	Difference in (KWH)	RTP KWH	(Short Gain)
5 July	15,000	39,240	31,214														
6 August	15,000	39,240	31,214														
7 September	15,000	39,240	31,214														
																	SUBTOTAL

1997	R	S	T	U	V	W	X	Y	Z	AA	BB	CC
	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base Bll	Adjusted LPT (KWH)	Adjusted RTP (KWH)	Difference in (KWH)	RTP KWH	(Shortfall) Gain
9 July												
10 August												
11 September												

1997	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base Bll	Adjusted LPT (KWH)	Adjusted RTP (KWH)	Difference in (KWH)	RTP KWH	(Shortfall) Gain
13 July												
14 August												
15 September												
												SUBTOTAL

1997	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base Bll	Adjusted LPT (KWH)	Adjusted RTP (KWH)	Difference in (KWH)	RTP KWH	(Shortfall) Gain
17 July												
18 August												
19 September												
												SUBTOTAL

1997	Max KW	On-Peak KW	Max KVAR	Excess KVAR	PXI KWH	On-Peak KWH	Adjusted PXI Base Bll	Adjusted PXI (KWH)	Adjusted RTP (KWH)	Difference in (KWH)	RTP KWH	(Shortfall) Gain
21 July												
22 August												
23 September												
												SUBTOTAL

24

GULF POWER COMPANY
 EXPERIMENTAL RATE RTP QUARTERLY REPORT
 BASE RATE REVENUE (SHORTFALL) GAIN

	A	B	C	D	E	F	G	H	CUSTOMER I	J	K	L	M				
1997	SE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KW/H	On-Peak KW/H	Adjusted LPT Base RM	Adjusted LPT \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
1 July	[REDACTED]																
2 August	[REDACTED]																
3 September	[REDACTED]																
4	SUBTOTAL												[REDACTED]				
CUSTOMER 8																	
1997	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KW/H	On-Peak KW/H	Adjusted LPT Base RM	Adjusted LPT \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain					
5 July	[REDACTED]																
6 August	[REDACTED]																
7 September	[REDACTED]																
8	SUBTOTAL												[REDACTED]				
CUSTOMER 9																	
1997	SE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KW/H	On-Peak KW/H	Adjusted LPT Base RM	Adjusted LPT \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
9 July	[REDACTED]																
10 August	[REDACTED]																
11 September	[REDACTED]																
12	SUBTOTAL												[REDACTED]				
CUSTOMER 10																	
1997	SE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KW/H	On-Peak KW/H	Adjusted LPT Base RM	Adjusted LPT \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
13 July	[REDACTED]																
14 August	[REDACTED]																
15 September	[REDACTED]																
16	SUBTOTAL												[REDACTED]				
CUSTOMER 11																	
1997	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	BB	CC	DD
	NC KW	BC KW	BC KW	Sum of Daily KW's	CMM/ NON-CMM	Max KW	Non-SE On-Peak KW	Max KVAR	Excess KVAR	SBS KW/H	On-Peak KW/H	Adjusted SBS Base RM	Adjusted SBS \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain
17 July	8,203	2,329	2,329	[REDACTED]													
18 August	8,203	2,329	2,329	[REDACTED]													
19 September	8,203	2,488	2,488	[REDACTED]													
20	SUBTOTAL																
CUSTOMER 12																	
1997	EE	FF	GG	HH	II	JJ	KK	LL	MM	NN	OO	PP	QQ				
	SE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KW/H	On-Peak KW/H	Adjusted LPT Base RM	Adjusted LPT \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
21 July	[REDACTED]																
22 August	[REDACTED]																
23 September	[REDACTED]																
24	SUBTOTAL												[REDACTED]				

GULF POWER COMPANY
EXPERIMENTAL RATE RTP QUARTERLY REPORT
BASE RATE REVENUE (SHORTFALL)GAIN

1997
1 July
2 August
3 September
4

A	B	C	D	E	F	G	CUSTOMER 13		J	K	L
Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base RM	Adjusted LPT \$/KWH	Adjusted RTP \$/KWH	Difference in \$/KWH	RTP KWH	(Shortfall) Gain
[REDACTED]											
										SUBTOTAL	[REDACTED]

1997
5 July
6 August
7 September
8

CUSTOMER 14											
Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base RM	Adjusted LPT \$/KWH	Adjusted RTP \$/KWH	Difference in \$/KWH	RTP KWH	(Shortfall) Gain
[REDACTED]											
										SUBTOTAL	[REDACTED]

9

TOTAL BASE RATE REVENUE (SHORTFALL)GAIN [REDACTED]

10
11
NOTE: The \$/KWH above includes base revenue only. It excludes fuel, ECCR, PPCC, ECR, and Additional Florida Gross Receipts Tax. Each month was recalculated using the previous rate applied to that month's billing determinants. [REDACTED]

GULF POWER COMPANY
EXPERIMENTAL RATE RTP QUARTERLY REPORT

Program Cost

Eleventh Quarterly Report

Report Period: Third Quarter 1997

	<u>3rd Quarter 1997</u>	<u>Year-To-Date</u>	<u>Project to Date</u>
Revenue (Shortfall)/Gain	(\$252,516.85)	(\$4,550,010.96)	(\$10,450,447.15)
Other RTP Program Costs	\$18,294.35	\$24,495.61	\$72,856.49

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The revenue (shortfall)/gain reported does not represent the differences in base rate revenues which may be attributed to this program. The amount reported is merely the result of calculating, for each month of the quarter, the difference between the base rate revenue in cents per KWH using the previous rate and the RTP base rate revenue in cents per KWH; then summing these monthly amounts to arrive at the reported amount.

GULF POWER COMPANY
 EXPERIMENTAL RATE RTP QUARTERLY REPORT
 BASE RATE REVENUE (SHORTFALL)GAIN

1997	A NCKWY	B RC KWY	C RG KWY	D Sum of Daily KWY's	E CMM/ NON-CMM	F Max KWY	G Non-SE On-Peak KWY	H Max KVAR	I Excess KVAR	J SBS KWYH	K On-Peak KWYH	L Adjusted SBS Base Bll	M Adjusted SBS \$/KWYH	N Adjusted RTP \$/KWYH	O Difference in \$/KWYH	P RTP KWYH	Q (Shortfall) Gain
1 July	10,000	18,329	18,329														
2 August	10,000	18,329	18,329														
3 September	10,000	18,329	18,329														
4	SUBTOTAL																

1997	NCKWY	RC KWY	RG KWY	Sum of Daily KWY's	CMM/ NON-CMM	Max KWY	Non-SE On-Peak KWY	Max KVAR	Excess KVAR	SBS KWYH	On-Peak KWYH	Adjusted SBS Base Bll	Adjusted SBS \$/KWYH	Adjusted RTP \$/KWYH	Difference in \$/KWYH	RTP KWYH	(Shortfall) Gain
5 July	15,000	39,240	31,214														
6 August	15,000	39,240	31,214														
7 September	15,000	39,240	31,214														
8	SUBTOTAL																

1997	R Max KWY	S On-Peak KWY	T Max KVAR	U Excess KVAR	V LPT KWYH	W On-Peak KWYH	X Adjusted LPT Base Bll	Y Adjusted LPT \$/KWYH	Z Adjusted RTP \$/KWYH	AA Difference in \$/KWYH	BB RTP KWYH	CC (Shortfall) Gain
9 July												
10 August												
11 September												

1997	Max KWY	On-Peak KWY	Max KVAR	Excess KVAR	LPT KWYH	On-Peak KWYH	Adjusted LPT Base Bll	Adjusted LPT \$/KWYH	Adjusted RTP \$/KWYH	Difference in \$/KWYH	RTP KWYH	(Shortfall) Gain
13 July												
14 August												
15 September												
16	SUBTOTAL											

1997	Max KWY	On-Peak KWY	Max KVAR	Excess KVAR	LPT KWYH	On-Peak KWYH	Adjusted LPT Base Bll	Adjusted LPT \$/KWYH	Adjusted RTP \$/KWYH	Difference in \$/KWYH	RTP KWYH	(Shortfall) Gain
17 July												
18 August												
19 September												
20	SUBTOTAL											

1997	Max KWY	On-Peak KWY	Max KVAR	Excess KVAR	LPT KWYH	On-Peak KWYH	Adjusted LPT Base Bll	Adjusted LPT \$/KWYH	Adjusted RTP \$/KWYH	Difference in \$/KWYH	RTP KWYH	(Shortfall) Gain
21 July												
22 August												
23 September												
24	SUBTOTAL											

GULF POWER COMPANY
 EXPERIMENTAL RATE RTP QUARTERLY REPORT
 BASE RATE REVENUE (SHORTFALL) GAIN

	A	B	C	D	E	F	G	H	CUSTOMER I	J	K	L	M				
1997	BE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPI KW/H	On-Peak KW/H	Adjusted LPI Base Bill	Adjusted LPI \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
1 July	[REDACTED]																
2 August	[REDACTED]																
3 September	[REDACTED]																
4	SUBTOTAL												[REDACTED]				
CUSTOMER 8																	
1997	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPI KW/H	On-Peak KW/H	Adjusted LPI Base Bill	Adjusted LPI \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain					
5 July	[REDACTED]																
6 August	[REDACTED]																
7 September	[REDACTED]																
8	SUBTOTAL												[REDACTED]				
CUSTOMER 9																	
1997	BE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPI KW/H	On-Peak KW/H	Adjusted LPI Base Bill	Adjusted LPI \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
9 July	[REDACTED]																
10 August	[REDACTED]																
11 September	[REDACTED]																
12	SUBTOTAL												[REDACTED]				
CUSTOMER 10																	
1997	BE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPI KW/H	On-Peak KW/H	Adjusted LPI Base Bill	Adjusted LPI \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
13 July	[REDACTED]																
14 August	[REDACTED]																
15 September	[REDACTED]																
16	SUBTOTAL												[REDACTED]				
CUSTOMER 11																	
1997	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	BB	CC	LL
	NC KW	BC KW	BC KW	Sum of Daily KW's	CMM/ NON-CMM	Max KW	Non-SE On-Peak KW	Max KVAR	Excess KVAR	SBS KW/H	On-Peak KW/H	Adjusted SBS Base Bill	Adjusted SBS \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain
17 July	8,203	2,329	2,329	[REDACTED]													
18 August	8,203	2,329	2,329	[REDACTED]													
19 September	8,203	2,468	2,468	[REDACTED]													
20	SUBTOTAL																
CUSTOMER 12																	
1997	EE	FF	GG	HH	II	JJ	KK	LL	MM	NN	OO	PP	QQ				
	SE KW	Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPI KW/H	On-Peak KW/H	Adjusted LPI Base Bill	Adjusted LPI \$/KW/H	Adjusted RTP \$/KW/H	Difference in \$/KW/H	RTP KW/H	(Shortfall) Gain				
21 July	[REDACTED]																
22 August	[REDACTED]																
23 September	[REDACTED]																
24	SUBTOTAL												[REDACTED]				

GULF POWER COMPANY
EXPERIMENTAL RATE RTP QUARTERLY REPORT
BASE RATE REVENUE (SHORTFALL)GAIN

1997
1 July
2 August
3 September
4

A	B	C	D	E	F	G	CUSTOMER 13		J	K	L
Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base Bll	H Adjusted LPT \$ASWH	I Adjusted RTP \$ASWH	Difference in \$ASWH	RTP KWH	(Shortfall) Gain
[REDACTED]											SUBTOTAL

1997
5 July
6 August
7 September
8

CUSTOMER 14											
A	B	C	D	E	F	G	CUSTOMER 14		J	K	L
Max KW	On-Peak KW	Max KVAR	Excess KVAR	LPT KWH	On-Peak KWH	Adjusted LPT Base Bll	H Adjusted LPT \$ASWH	I Adjusted RTP \$ASWH	Difference in \$ASWH	RTP KWH	(Shortfall) Gain
[REDACTED]											SUBTOTAL

TOTAL BASE RATE REVENUE (SHORTFALL)GAIN [REDACTED]

10 NOTE: The \$ASWH above includes base revenue only. It excludes fuel, ECCR, PPCC, ECR, and Additional Florida Gross Receipts Tax. Each month was recalculated using the previous rate applied to that month's billing determinants. [REDACTED]

EXHIBIT "C"

Line-by-Line Justification

<u>Page/Line(s)</u>	<u>Columns</u>	<u>Justification</u>
Page 2 Lines 1 - 8	A - Q	<p>This data is proprietary confidential business information that details customer specific information. A limited number of customers take service under rate schedule RTP. One of those customers has ceased taking service pursuant to rate schedule RTP. Removal of this customer from the Quarterly Real Time Pricing Program report reveals that customer's billing determinants, load shape and other customer specific information. This information is regarded as sensitive and confidential by the customer because its public disclosure would impact the customer's ability to compete in its native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.</p>
Lines 9 - 24	R - CC	
Page 3 Lines 1 - 16	A - M	<p>This data is proprietary confidential business information that details customer specific information. A limited number of customers take service under rate schedule RTP. One of those customers has ceased taking service pursuant to rate schedule RTP. Removal of this customer from the Quarterly Real Time Pricing Program report reveals that customer's billing determinants, load shape and other customer specific information. This information is regarded as sensitive and confidential by the customer because its public disclosure would impact the customer's ability to compete in its native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.</p>
Lines 17 - 20	N - DD	
Lines 21 - 24	EE - QQ	

Line-by-Line Justification

<u>Page/Line(s)</u>	<u>Columns</u>	<u>Justification</u>
Page 4 Lines 1 - 9	A - L	This data is proprietary confidential business information that details customer specific information. A limited number of customers take service under rate schedule RTP. One of those customers has ceased taking service pursuant to rate schedule RTP. Removal of this customer from the Quarterly Real Time Pricing Program report reveals that customer's billing determinants, load shape and other customer specific information. This information is regarded as sensitive and confidential by the customer because its public disclosure would impact the customer's ability to compete in its native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.
Line 11		